UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
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Statement of Qualifications? Ted Fitzgerald
June target date
Action Memo
Monthly
Kirk Minckler
OGC - Gary Fremerman
dft. MOU
IAG -

Ref: 8EPR-ER

MEMORANDUM

To: Max Dodson

From: Pete Stevenson

Through: Doug Skie

Steve Hawthorn

Subject: American Fork Canyon USFS and Private Property Sites

I toured the sites in American Fork Canyon (AFC) on September 12 and 13, 2000, with personnel from the USFS, UDERR, BuRec, and the local health department. My findings are that there are two sites that meet the criteria for time critical Removal actions that should be pursued immediately for clean up next spring. There are also other potential sites that may meet the criteria for time critical Removal actions that will need further Removal investigation which should be scheduled next spring. For planning purposes, Removal activity and investigations can be reliably conducted from about June 1 to October 15, depending on snow pack.

AFC was visited by 1,200,000 people in 1999, and it is expected that just before and during the 2002 Olympics that use will increase above the expected "normal" increases that the Unitah National Forest is experiencing. The north fork of American Fork River may be home to a population of Bonneville cutthroat trout, and the habitat is suitable for the spotted frog, though none have been identified. People ride ATVs across tailings piles and waste rock piles, camp on or near the same piles, and generally contact tailings and waste rock in varying amounts depending on the location of the piles.

The USFS opinion is to consider the entire canyon area as one site to facilitate movement of tailings, etc. around the canyon to a repository. Specific areas within the site would then be operable units (OUs), and require separate Action Memoranda. This would not only reduce the number of repositories in AFC but also allow tracking of costs per specific areas where specific PRPs can be identified for each area. Mill tailings, waste rock piles, smelter wastes, and adit discharges make up the majority of identified problems in AFC. I will follow with a brief description of the currently identified OUs:

Pacific Mine and Mill Site

The Pacific Mine and Mill site sits adjacent to and in the north fork of the American Fork River. It might be about 50% on private property, if the waste pile above a cabin to the west is included. Approximately 46,000 tons of tailings with an average concentration of 17,000 mg/kg (1.7%) lead are in or next to riparian areas, with seasonal water levels at or near the surface of the lower tailings area. ATV use of the tailings piles and camping on and near the tailings piles occurs daily by many people. Spring runoff, if severe, could wash the tailings down the river, making recovery impossible. My recommendation is to immediately gather necessary information, including developing a cost estimate, so as to be able to plan a Removal action to start on June 1, 2001. Both the EPA Removal Program and the USFS would work in concert to accomplish this, with EPA taking the lead on the Action Memorandum, enforcement, and cost recovery.

Dutchman Flat

This heavily utilized area contains a large tailings pile next to a historic stamp mill foundation, a parking lot, the surface of which contains high lead concentrations, and another waste rock pile up in the woods behind the old mill site. USFS plans on further investigations here, and has not yet located monuments to better define land ownership. However, this site could also be about 50% in private ownership. Lead has been quantified as high as 6.8% in the tailings pile. People camp all around the tailings, ride ATVs over the tailings, and park and off-load ATVs in the parking lot. My recommendation is to immediately gather necessary information, including developing a cost estimate, so as to be able to plan a Removal action to start on June 1, 2001. This site is also one of the two repository sites identified and will also be investigated as such.

Smelter Site

The Smelter site is currently under investigation by the USFS. The smelter straddled Mary Ellen Gulch, and apparently was near or on the road. Slag is evident in a camping area and a parking area, and the few screening samples available indicate lead concentrations may be high. For this site, I recommend that we wait for the results from the USFS investigation, and continue Removal investigations as needed next working season (June to Oct.). There is a good possibility of conducting a time critical investigation at this site when all the data is in and available for review next winter.

Yankee Mine Area

The Yankee Mine area is on private property, with just an out wash of a waste rock/tailings pile extending onto USFS land. As such, it has not been screened by USFS. It is

about two miles up a bad road, and is obviously visited by 4 wheelers and ATVers, with one camp fire ring evident on the tailings pile itself. There are at least three adit discharges, and also tailings right in the main branch of Mary Ellen Gulch. I recommend that the EPA Removal Program conduct an investigation next working season at this site. If the waste rock and tailings contain high concentrations of lead, this site also may qualify as a time critical Removal action.

Scotchman 2 Waste Pile

This relatively small waste pile sits on a steep slope just above the north fork of American Fork River, and just below and possibly on a 4X4 road. Only a couple of samples have been collected, which indicate the potential for high lead concentrations. This waste pile is located on private property. I recommend that a Removal investigation be conducted by USFS next working season.

Bog Mine

The Bog Mine waste rock/tailings pile sits on a bog, portions of which spontaneously combust! Lead concentrations are as high as 2.9%, and arsenic may be as high as 1460 mg/kg. The owners of the lease (with the land ownership reverting back to USFS?) are the children of a deceased couple, and are all in their 80s. Road access to the Bog Mine area is ok, depending on which road you take, but it is less accessible than the sites below. I recommend that a Removal investigation be conducted by USFS next working season.

Lower Bog Mine

The Lower Bog Mine adit discharges water, which contacts the waste pile. Four samples collected from the waste pile indicate that metals values, including lead, are below Removal action levels.

Miller Hill Area

The Miller Hill Area contains numerous sites at high elevation. The USFS is conducting investigations of the area next working season, including a risk screening. I recommend that we wait to review their assessment.

Miller Hill Tunnel Area

This area is on/in the north fork of the American Fork River. The adit discharges water, and the waste pile extends into the creek. The waste pile was also used as a source of road material for the road north of Dutchman Flat to the Pacific Mine. Six screening samples have been collected by USFS, and the metals values are well below Removal action levels. However, it is bothersome that this area was used as a borrow area for road construction, since this road is a significant source of dust. Therefore, I recommend that a Removal investigation be conducted by USFS next working season.